

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
CENTRAL DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
vs.)	No. 17-00064-01-W-DGK
)	
ROBERT LORENZO HESTER, JR.,)	
)	
Defendant.)	

UNOPPOSED MOTION FOR CONTINUANCE

Comes now defendant, Robert Lorenzo Hester, Jr., by counsel Troy K. Stabenow, and moves this Court, pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B), to remove this case from the scheduled trial docket and to continue this case until the January, 2019, trial docket.

SUGGESTIONS IN SUPPORT

1. Mr. Hester is currently in custody awaiting trial.
2. The government representative in this case, Mr. Brian Casey, Assistant United States Attorneys, indicated that the United States does not oppose this delay.
3. Counsel and the government are exploring potential means of resolving this case. Due to the nature and substance of the charges, and the level of oversight associated with the case, such discussions will necessarily be involved and lengthy.
4. This continuance is not sought for purpose of dilatory delay, but is sought in truth and fact so that the defendant may fully investigate the case and adequately explore alternate means of resolving the case.

5. In accordance with 18 U.S.C. § 3161(h)(8)(A) and (B)(iv), it is submitted that a continuance outweighs the best interests of the public and the defendant to a speedy trial, which is required by 18 U.S.C. § 3161(c)(1). Under the provisions of 18 U.S.C. § 3161(h)(8)(A), the period of time until the requested criminal trial docket setting should be excluded in computing the period of time in which the defendant should be brought to trial under the provisions of the Speedy Trial Act.

WHEREFORE, defendant, Robert Lorenzo Hester, Jr., respectfully requests this Court, pursuant to 18 U.S.C. § 3161(h)(8)(A) and (B), to continue this case until the January, 2019, trial docket, or to any other subsequent date which this Court deems appropriate.

Respectfully submitted,

/s/ Troy K. Stabenow

TROY K. STABENOW, # 57067

Assistant Federal Public Defender

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Attorney for Defendant

August 1, 2018

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of August, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which sent e-mail notification of such filing to all CM/ECF participants in this case, and a copy was mailed, via the United States Postal Service, to all non-CM/ECF participants.

/s/ Troy K. Stabenow

TROY K. STABENOW